

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION**

UNITED STATES OF AMERICA)
)
)
v.) **Criminal Action No.: 4:18-CR-00011**
)
)
PHILLIP DAEKWON MILES,)
)
)
Defendant.)

RESPONSE REGARDING JURY QUESTIONNAIRE

Comes now the defendant, Phillip Daekwon Miles, by counsel, and submits this response to the Court's Order, ECF 441, directing the parties to file any comments, suggestions, or objections regarding the Jury Questionnaire.

1. We join the objections made and the suggestions offered by Defendant Deshaun Lamar Trent in his Response, ECF 450, at pages 2-5, under the heading "II: Revised Questions." We further join and adopt the reasoning offered by Defendant Kevin Trent in his Response, ECF 451 at pages 1-2.
2. Like the suggestion offered by Defendant Kanas Trent in his Response, ECF 454, on page 1, regarding the potential juror's prior employment, we suggest a follow-up question for the potential juror who answers, in response to the Court's proposed Question 6, that he or she is retired. That is: "If you are retired, where were you working when you retired and what was the nature of that work?"

Respectfully submitted,

PHILLIP DAEKWON MILES

By Counsel

s/ M. Tyson Daniel

M. Tyson Daniel, Esq. (VSB# 43979)
MAGEE GOLDSTEIN LASKY & SAYERS PC
310 First Street SW, Suite 1200
Roanoke, Virginia 24011
Telephone: (540) 343-9800
Facsimile: (540) 343-9898
Email: tdaniel@mglspc.com

Cary B. Bowen, Esq. (VSB# 17313)
BOWEN, CLEMENTS & FAVRET, PLLC
8740 Landmark Road
Richmond, Virginia 23228
Telephone: (804) 801-5939
Facsimile: (804) 597-0067
Email: cbowen@carybowenlaw.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I, M. Tyson Daniel, Esq., hereby certify that, on this 9th day of May 2019, I electronically filed the foregoing Response with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ M. Tyson Daniel
Counsel for Defendant